

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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	:	
NETRATINGS, INC.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No. 05-cv-314-GMS
	:	
COREMETRICS, INC.,	:	
	:	
Defendant.	:	
-----X	:	

STIPULATION

Plaintiff NetRatings, Inc. ("NetRatings"), by and through its undersigned counsel, and Defendant Coremetrics, Inc. ("Coremetrics"), by and through its undersigned counsel, hereby stipulate, subject to the approval of the Court, to the following:

1. Counsel for Coremetrics presently has in its possession approximately 70,000 pages of material recently collected from Coremetrics, including approximately 30,000 pages which were produced to NetRatings on Friday, March 17, 2006 in response to NetRatings' requests for documents. Coremetrics will produce, subject to the written objections and responses that it has previously provided to NetRatings' document requests, all nonprivileged materials from the remaining Coremetrics documents presently in counsel's possession that are responsive to the unobjectionable portions of NetRatings' document requests, such that the materials are received by NetRatings no later than March 27, 2006. NetRatings reserves its rights to dispute the propriety of any of Coremetrics' objections and/or the adequacy of Coremetrics' production.

2. Coremetrics will complete production, subject to the written objections and responses that it has previously provided to NetRatings' document requests, of all nonprivileged materials that are responsive to the unobjectionable portions of NetRatings' document requests such that the materials are received by NetRatings no later than April 14, 2006. Nothing in this stipulation shall bar Coremetrics from producing at a later date, consistent with its rights and obligations under the Federal Rules of Civil Procedure and the scheduling order governing this case, materials that are first discovered at a later date. NetRatings reserves its rights to dispute the propriety of any of Coremetrics' objections and/or the adequacy of Coremetrics' production.

3. Notwithstanding any other dates for document production set forth herein, Coremetrics will produce, subject to the written objections and responses that it has previously provided to NetRatings' document requests, all nonprivileged materials that are responsive to the unobjectionable portions of NetRatings' document requests and that relate to the subject for which a witness is being produced for deposition by Coremetrics as its Federal Rule 30(b)(6) designee at least one week prior to the date of such witness's deposition. NetRatings reserves its rights to dispute the propriety of any of Coremetrics' objections and/or the adequacy of Coremetrics' production.

4. The Federal Rule of Civil Procedure 30(b)(6) deposition of Coremetrics will go forward beginning on April 17, 2006, and will continue on April 24 and 25, 2006. Coremetrics will be producing Hamid Bahadori as its witness on behalf of Coremetrics on April 17, 2006, Mark Resnick as its witness on behalf of Coremetrics on April 24, 2006 and Seth Weissman as its witness on behalf of Coremetrics on April 25, 2006.

AGREED TO AND ACCEPTED:

Dated: Wilmington, Delaware
March 21, 2006

Counsel for NetRatings, Inc.

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By: 

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By: /s/ John G. Day

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SO ORDERED:

Date

United States District Judge